

STORCH AMINI & MUNVES PC
Two Grand Central Tower, 25th Floor
140 East 45th Street
New York, New York 10017
Tel. (212) 490-4100
Steven G. Storch (SS-5241)
Kathleen E. Wright (KW-5439)
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	
IRA NATHEL and SHELDON NATHEL,	:
	:
Plaintiffs,	:
	:
-against-	: 07 CIV. 10956
RICHARD SIEGAL, GEORGE COLEMAN, ROBERT A. :	
TREVISANI, PAUL HOWARD, HARVEY JOSEPHSON,	:
RICHARD S. GURALNICK, SCHAIN LEIFER :	NOTICE OF
GURALNICK, BISTATE OIL MANAGEMENT :	<u>CROSS-MOTION</u>
CORPORATION, SS&T HOLDING CO., LLC, :	
PALACE EXPLORATION COMPANY, TAH :	
DRILLING CO., INC., TAQ DRILLING CO., INC., and :	
OIL AND GAS TITLE HOLDING CORPORATION :	
	:
Defendants.	:
-----X	

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of Kathleen E. Wright, dated May 2, 2008, and the exhibits attached thereto, and upon all the pleadings and proceedings had herein, Plaintiffs will cross-move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 15A, on June 10, 2008, at 2:15, for an order pursuant to Fed. R. Civ. P. 15(a) granting Plaintiffs leave to file their proposed Second Amended Complaint and for such other and further relief as to this Court seems just and proper.

Dated: New York, New York
May 2, 2008

STORCH AMINI & MUNVES PC



Steven G. Storch (SS-5241)
Kathleen E. Wright (KW-5439)
Two Grand Central Tower, 25th Floor
140 East 45th Street
New York, New York 10017
Tel. (212) 490-4100
Attorneys for Plaintiffs

To: Sean O'Brien, Esq.
ARKIN KAPLAN RICE LLP
590 Madison Avenue
New York, New York 10022

Attorneys for Defendants
Richard Siegal, Paul Howard, Bistate Oil Management Corp.
SS&T Holding Co., LLC, Palace Exploration Co.
TAQ Drilling Co., Inc., TAH Drilling Co, Inc. and
Oil and Gas Title Holding Corp.

John H. Eickemeyer, Esq.
VEDDER PRICE, P.C.
1633 Broadway, 47th Floor
New York, New York 10019

Attorneys for Defendants
Richard S. Guralnick and Schain Leifer Guralnick

Scott M. Himes, Esq.
STILLMAN FRIEDMAN & SHECHTMAN P.C.
425 Park Avenue
New York, New York 10022

Attorneys for Defendants
George Coleman and Robert A. Trevisani

Susan B. Ratner, Esq.
INGRAM YUZEK GAINEN CARROLL & BERTOLOTTI, LLP
250 Park Avenue, 6th Floor
New York, New York 10177

Attorneys for Defendant
Harvey Josephson